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DONALD MARQUEZ

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD MARQUEZ,)	CASE NO.: 2:20-cv-01247-JAD-EJY
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	THIRTY (30) DAY EXTENSION OF
vs.)	TIME FOR PLAINTIFF TO FILE
)	OPPOSITION TO MOTION FOR
SAFECO INSURANCE COMPANY OF)	SUMMARY JUDGMENT
ILLINOIS)	
)	
Defendant.)	[FIRST REQUEST]
)	
)	ECF No. 22
)	

COME NOW, Plaintiff, DONALD MARQUEZ (hereinafter "Plaintiff"), by and through his attorneys of record, Kevin Spreng, Esq., of SPRENG LAW, and Defendant SAFECO INSURANCE COMPANY OF ILLINOIS (hereinafter also referred to as "Safeco" or "Defendant"), by and through its attorneys, the law firm of KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and hereby submit this joint stipulated request to extend the time for Plaintiff to file his Opposition to Defendant's Motion for Partial Summary Judgment for thirty (30) days.

This request to extend time to file Plaintiff's Opposition is to allow the parties to further discuss settlement and/or stipulate to an Alternative Dispute Resolution.

A. Statement Supporting the Necessity of Extending Dates

This extension is necessary to allow the parties to further address possible settlement parameters and/or the option of pursuing a binding Alternative Dispute Resolution. Counsel for both parties have engaged in meaningful discussions and believe it would be in the best interest of the parties – and this court – to extend the briefing deadline for thirty (30) days to facilitate

1 those discussions. The parties have a good faith belief that a partial or complete resolution will
2 be agreed to within the next few weeks, thus saving time and resources of all involved.

3 **B. Proposed Revised Briefing Schedule**

4 With a thirty (30) day extension for Plaintiff to file his Opposition to Defendant's Motion
5 for Partial Summary Judgment, the new Opposition filing date will be **May 2, 2022**. With
6 Defendant's Reply being due **May 16, 2022**.

7 DATED this ^{31st} day of ^{March} ___, 2022.

8 KOELLER, NEBEKER, CARLSON
9 & HALUCK, LLP

10 By: /s/ Andrew C. Green, Esq.
11 ANDREW C. GREEN, ESQ.
12 Nevada Bar No. 9399
13 VALENTINE C. VIDAL, ESQ.
14 Nevada Bar. No. 14428
15 400 S. 4th Street, Suite 600
16 Las Vegas, NV 89101
17 Attorneys for Defendant,
18 SAFECO INSURANCE COMPANY
19 OF ILLINOIS

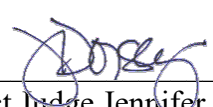
DATED this ^{31st} day of ^{March} ___, 2022

SPRENZ LAW

By: /s/ Kevin A. Spreng, Esq.
KEVIN SPRENZ, ESQ.
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9960 W. Cheyenne Ave. #170
Las Vegas, NV 89129
Attorneys for Plaintiffs,
DONALD MARQUEZ

15 **ORDER**

16 **IT IS SO ORDERED.**

17 
18 U.S. District Judge Jennifer A. Dorsey
19 Dated: April 6, 2022

20 Respectfully Submitted by:

21 SPRENZ LAW

22 By: /s/ Kevin A. Spreng, Esq.
23 Kevin A. Spreng, Esq.
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DONALD MARQUEZ

From: Kevin Sprenz
To: Trinidad Acosta-Christon
Subject: FW: Stipulation and Order for Extension to OPP.docx
Date: Thursday, March 31, 2022 4:16:49 PM
Attachments: [image003.png](#)
[Stipulation and Order for Extension to OPP.docx](#)
[image002.png](#)

Please file :)

Kevin A. Sprenz, Esq.



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From: Andrew C. Green [mailto:andrew.green@knchlaw.com]
Sent: Thursday, March 31, 2022 4:14 PM
To: Kevin Sprenz <ksprenz@sprenzlaw.com>
Subject: Stipulation and Order for Extension to OPP.docx

Here this is with those couple adjustments I mentioned on the phone. You can use my e-signature.
Thanks again. Andrew

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KOELLER ■ NEBEKER
CARLSON ■ HALUCK LLP

IRVINE | SAN DIEGO | PHOENIX | LAS VEGAS | SACRAMENTO | ORLANDO | AUSTIN | MIAMI

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